

**Lieff
Cabraser
Heimann &
Bernstein**
Attorneys at Law

Susman Godfrey l.l.p.
a registered limited liability partnership



April 4, 2025

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

RE: *Authors Guild v. OpenAI Inc.*, (No. 1:23-cv-08292-SHS)
Alter v. OpenAI Inc., (No. 1:23-cv-10211-SHS)

Dear Judge Wang:

On behalf of the Author Plaintiffs, we oppose Defendants' request, Dkt. No. 394, to adjourn the April 10 discovery conference that has been scheduled since January 24, 2025.

After months of extensive conferrals, the parties have diligently briefed a number of fact-and-case-specific issues. The impasses reflected in these motions will not be aided by further delay. On the contrary, the resolution of these matters will materially inform the next steps in these cases.

The imminent centralization of a small number of additional cases to effectuate the goal of efficiency is not a basis to stop forward movement; it is, instead, further reason to hold the conference that this Court set more than three months ago.

Respectfully Submitted,

LIEFF CABRASER HEIMANN
& BERNSTEIN LLP

SUSMAN GODFREY LLP

COWAN, DEBAETS,
ABRAHAM & SHEPPARD
LLP

/s/ Rachel Geman
Rachel Geman

/s/ Rohit Nath
Rohit Nath

/s/ Scott J. Sholder
Scott J. Sholder